

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(FM)

JAMES P. KREINDLER, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Ashton* plaintiffs in the above-captioned litigation and I submit this declaration in support of the revised proposed order granting final judgment on behalf of the individual claimants set forth on the attached Exhibit A.
2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm's representation of the *Ashton* plaintiffs listed in Exhibit A in connection with the September 11<sup>th</sup> litigation against airline defendants, other court records relating to the multi-district litigation to which the *Ashton* plaintiffs are parties and conversations had with family members to the *Ashton* plaintiffs. Any matters about which I lack personal knowledge are asserted herein upon information and belief.
3. This declaration and the attached revised Exhibit A and revised proposed Order are submitted in response to this Court's October 20, 2016 Order directing the *Ashton* plaintiffs to remove any non-immediate family members from the list of claimants entitled to receive solatium damages as a result of the deaths of their relatives in the September 11<sup>th</sup> terrorist attacks. *See* 03-md-1570 (02-cv-6977) (S.D.N.Y.) (GBD) (SN), Doc. No. 3368 (Doc. No. 801.)
4. The attached Exhibit A includes information about the economic loss suffered as a result of the deaths in the September 11<sup>th</sup> terrorist attacks of the decedents listed therein. The

family members listed in Exhibit A are all spouses, children, parents or siblings – that is, they are the relatives that have previously been classified as immediate family members of the decedents, entitled to recover solatium damages. This attached Exhibit A replaces the exhibit submitted with my October 18, 2016 declaration. All other assertions therein and in prior papers concerning economic loss and solatium damages for immediate family members is incorporated herein by reference. *See* 03-md-1570 (02-cv-6977) (S.D.N.Y.) (GBD) (SN), Doc. Nos. 3357-1 and 3357-2, Filed 10/11/2016.

5. Accordingly, filed herewith is a revised proposed final judgment conforming with the Court's October 20, 2016 order. The revised Exhibit A attached hereto reflects the changes requested in the October 20, 2016 order. The economic loss figures in Exhibit A are supported by the expert reports attached as Exhibit B to my earlier declaration and the solatium damages reflect the amounts previously awarded to relatives of those killed on September 11.

Dated: October 21, 2016  
New York, NY

/s/ James P. Kreindler  
James P. Kreindler (JK7084)